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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

CORY SPENCER, an individual; DIANA
MILENA REED, an individual; and
COASTAL PROTECTION RANGERS,
INC., a California non-profit public
benefit corporation,

Plaintiff,

vs.

LUNADA BAY BOYS; THE
INDIVIDUAL MEMBERS OF THE
LUNADA BAY BOYS, including but not
limited to SANG LEE, BRANT
BLAKEMAN, ALAN JOHNSTON AKA
JALIAN JOHNSTON, MICHAEL RAE
PAPAYANS, ANGELO FERRARA,
FRANK FERRARA, CHARLIE
FERRARA; CITY OF PALOS VERDES
ESTATES; CHIEF OF POLICE JEFF
KEPLEY, in his representative capacity;
and DOES 1-10,

Defendants.

Case No. 2:16-cv-2129

Judge: Hon. S. James Otero
Dept: Courtroom 10C

Magistrate Judge:
Hon. Rozella A. Oliver

**FRANK FERRARA'S AND
CHARLIE FERRARA'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR
ADMINISTRATIVE RELIEF
PURSUANT TO FRCP 56(d)**

Date: September 5, 2017
Time: 10:00 a.m.
Dept: Courtroom 10C

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

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Defendants, FRANK FERRARA and CHARLIE FERRARA (hereinafter, the “Ferraras”), hereby submit the following Opposition to Plaintiffs’, CORY SPENCER, DIANA REED and COASTAL PROTECTION RANGERS, INC. (hereinafter “Plaintiffs”), Motion for Administrative Relief (“Motion”).

MEMORANDUM OF POINTS AND AUTHORITIES

1. INTRODUCTION

Plaintiffs, CORY SPENCER, DIANA REED and COASTAL PROTECTION RANGERS, INC. (hereinafter “Plaintiffs”), have not demonstrated good cause for the denial of Defendants, FRANK FERRARA and CHARLIE FERRARA (hereinafter referred to collectively as the “Ferraras”), Motions for Summary Judgment or, in the alternative, Partial Summary Judgment (“MSJs”) under *Federal Rule of Civil Procedure* 56(d). The Ferraras have produced documents responsive to Plaintiffs’ discovery requests, and Plaintiffs do not assert the Ferraras continue to wrongfully withhold responsive documents. Instead, Plaintiffs contend only that they have not had sufficient opportunity to analyze the documents in order to respond to the Ferraras’ MSJs.

Plaintiffs can point to no evidence or shred of proof that the Ferraras engaged in any activity that would justify any of the relief permitted by Rule 56(d). Plaintiffs base their motion entirely on speculation that text messages between Defendant Sang Lee and the Ferraras might contain information supporting their opposition. However, these texts have been demonstrated through various testimonies in this matter not to be supportive of Plaintiffs’ claims or in any way related to the claims made in this action.¹ Throughout the duration of this case, Plaintiffs have clung to the repeatedly disproved assumption that Charlie Ferrara was involved in an alleged conspiracy with the “Bay Boys,” but unassailable evidence has now demonstrated

¹ Bacon Decl, Ex. E, Sang Lee Dep. at 294:14-295:25; Ex. F, F. Ferrara Dep. at 275:16-276:23; Ex. G, C. Ferrara Dep. at 47:25-50:21.

1 that the subject recorded conversation was between Plaintiff Reed and Leo Ferrara,
2 not Charlie Ferrara. It is a demonstrative fact provided through the third party
3 admission of Leo Ferrara that he was in fact the person on the recording speaking to
4 Plaintiff Reed and not Charlie Ferrara, supported by the testimony of various
5 witnesses in the action.²

6 Plaintiffs have provided no evidence supporting a reasonable belief that further
7 discovery will lead to evidence supporting Plaintiffs' denial of the Ferraras' MSJs.
8 Plaintiffs have submitted no evidence supporting their assertion that the Ferraras
9 have acted in concert with the other defendants in this action. Rather, Plaintiffs
10 speculate that a few text messages between parties to this action might assist
11 Plaintiffs in their opposition, with no factual basis whatsoever for the belief. Based
12 on the foregoing and the reasons set forth in this Opposition, Plaintiffs' Motion for
13 Administrative Relief must be denied.

14 **2. STATEMENT OF FACTS**

15 The Ferraras served their Answers to Plaintiffs' Class Action Complaint on
16 September 2, 2017. Counsel for the Ferraras, Alison Hurley, Esq. and Tiffany
17 Bacon, Esq., filed Notices of Appearance in this matter on March 29, 2017. (Docket
18 Nos. 236 and 237.) On April 14, 2017, counsel for the Ferraras received their first
19 email from Plaintiffs' counsel demanding a call with Magistrate Judge Oliver,
20 without a prior letter or call to informally address Plaintiffs' discovery issues.
21 (Bacon Decl., ¶ 3, Ex. A.) Counsel for Plaintiffs and the Ferraras met and conferred
22 on April 21, 2017 for the first time regarding Plaintiffs discovery issues. (Bacon
23 Decl., ¶ 4.) Plaintiffs' counsel did not respond to the Ferraras' counsel's follow-up
24 correspondence until May 1, 2017. (Bacon Decl., ¶ 4.)

25
26 ² Bacon Decl, Ex. I, Declaration of Leo Ferrara; Ex. H, N.F. Dep. at 142:24-143:9;
27 Ex. G, C. Ferrara Dep. at 134:20-136:20. Moreover, there is only one recording
28 produced by Plaintiffs in this action asserted to involve Charlie Ferrara.

1 In the midst of meeting and conferring on the Ferraras' responses to Plaintiffs'
2 document requests, Plaintiffs served six additional sets of discovery on the Ferraras.
3 (Bacon Decl., ¶ 5.) Plaintiffs were informed that the Ferraras were making diligent
4 efforts to obtain cellular phone records from their provider. (Bacon Decl., ¶ 6.)
5 Plaintiffs' counsel sent a letter on June 27, 2017 further demanding a telephonic
6 hearing with Magistrate Judge Oliver. (Bacon Decl., ¶ 7, Ex. B.) On or about July 3,
7 2017, Plaintiffs' counsel and counsel for the Ferraras had another informal meet and
8 confer, wherein Plaintiffs' counsel, for the first time, requested the Ferraras conduct
9 a full extraction of cellular phone data, which had not been specifically requested in
10 any discovery request. (Bacon Decl., ¶ 8.) Plaintiffs' counsel was informed the
11 Ferraras would make efforts to extract their cellular phone data in order to produce
12 responsive documents to Plaintiffs' requests. (Bacon Decl., ¶ 9.) On the date of
13 Frank Ferrara's deposition on July 10, 2017, Plaintiffs' counsel sent an email
14 demanding a telephonic hearing with Magistrate Judge Oliver, which Ferraras'
15 counsel was unable to respond to until the evening after the conclusion of the
16 deposition going forward in this very case. (Bacon Decl., ¶ 10, Ex. C.) After a
17 telephonic hearing with Magistrate Judge Oliver on July 13, 2017, the Ferraras were
18 ordered "to produce responsive documents from the cell phone imaging and
19 responsive cell phone bills and records" within only four days, by July 17, 2017.
20 (Bacon Decl., ¶ 11; Wolff Decl., Ex. 14.)

21 The Ferraras were unable to complete the extraction of data from their cellular
22 phones until July 16, 2017, which resulted in approximately 3,200 pages of
23 documents, the majority of which was required to be vetted for actual responsive
24 information to Plaintiffs' document requests. (Bacon Decl., ¶ 12.) On July 17, 2017,
25 the Ferraras in good faith produced 1,200 pages of responsive documents, the
26 amount their counsel had been able to review within the exceptionally short time
27 period since extraction was completed. (Bacon Decl., ¶ 13.) Following this
28 production, on July 18, 2017, Plaintiffs' counsel sent a letter indicating the

1 production was improperly redacted. Bacon Decl., ¶ 14, Ex. D.) Counsel for the
2 Ferraras explained that redactions were made in order to produce only responsive
3 information to Plaintiffs' requests. (Bacon Decl., ¶ 14.) Despite informing
4 Plaintiffs' counsel of this fact and that the remaining responsive documents would be
5 produced as expeditiously as possible, Plaintiffs demanded an additional telephonic
6 hearing with Magistrate Judge Oliver, which was held on July 26, 2017 pursuant to
7 the Court's availability. (Bacon Decl., ¶ 15.) The Court was informed that further
8 production of responsive information, not otherwise attainable on July 17, 2017
9 would be produced to Plaintiffs' counsel as quickly as possible, and the Court made
10 no further order regarding the Ferraras' production, only setting a briefing schedule
11 on Plaintiffs' request for sanctions. (See Wolff Decl., Ex. 15.) As of July 27, 2017,
12 the Ferraras had produced all responsive documents within their possession
13 responsive to Plaintiffs' requests. (Bacon Decl., ¶ 16.) As such, Plaintiffs had
14 received all responsive documents in the Ferraras' possession on July 27, 2017, well
15 in advance of Plaintiffs' deadline to oppose the Ferraras' MSJs on August 7, 2017.

16 **3. ARGUMENT**

17 **3.1 Plaintiffs Have Not Submitted Any Evidence Supporting the**
18 **Assertion That a Conspiracy Exists, or Could Exist, Between the**
Ferraras and the Other Defendants

19 Plaintiffs have been conducting, or should have been conducting, formal
20 discovery in this action for the last year. Despite having received a multitude of sets
21 of discovery responses from the parties in this case, Plaintiffs have not and cannot
22 submit any evidence that the Ferraras ever engaged in any communications with the
23 other defendants that amount to conspiracy in support of Plaintiffs' claims in this
24 matter. Such is demonstrated by the fact that Plaintiffs only refer to supposedly
25 missing communications between Defendant Sang Lee and the Ferraras that they
26 speculate might contain information relevant to this matter. Both the Ferraras and
27 Sang Lee have consistently testified that their prior text communications have
28 nothing to do with Plaintiffs or any information that would support Plaintiffs' claims

1 in this action. (*See* Docket Nos. 286-4 and 287, Frank Ferrara’s Statement of
2 Uncontroverted Facts Nos. 13-14 and Charlie Ferrara’s Statement of Uncontroverted
3 Facts Nos. 31-34.) The mere existence of a few communications between the
4 Ferraras and Defendant Sang Lee during a period of time not relevant in Plaintiffs’
5 Complaint does not provide a reasonable basis for a request pursuant to Rule 56(d).³

6 Moreover, as is addressed in the Ferraras’ MSJs, in order for Plaintiffs to
7 prove their conspiracy allegations under Civil Code section 52.1(j), Plaintiffs must
8 demonstrate that, based on speech alone, “the speech itself threatens violence against
9 a specific person or group of persons; and the person or group of persons against
10 whom the threat is directed reasonably fears that, because of the speech, violence
11 will be committed against them or their property and the person threatening the
12 violence had the apparent ability to carry out the threat.” (Civ. Code § 52.1(j).)
13 Plaintiffs literally have no stated basis upon which to even establish any possibility
14 that any communications between the Ferraras and the other defendants threatened
15 violence against the Plaintiffs and that the Plaintiffs, in turn reasonably feared
16 violence would be committed against them. Plaintiffs have not and cannot produce
17 evidence that any text communication was made directly by the Ferraras to either
18 Plaintiff. Speculation that the Ferraras may have communicated with other
19 defendants on any topic related to Lunada Bay is simply incapable of supporting the
20 requested relief, as the conspiracy claim must be proven by speech threatening
21 violence against the Plaintiffs that actually caused them to fear violence. No
22 evidence whatsoever supports the same as to either Frank Ferrara or Charlie Ferrara.
23 Plaintiffs cannot justify their motion by simply lumping all of the defendants

24
25 ³ It is perplexing why Plaintiffs did not pursue other formal efforts to obtain the
26 cellular phone records of the Ferraras given their apparent critical concern regarding
27 communications allegedly supporting a conspiracy between all of the defendants.
28 Despite informing Plaintiffs’ counsel of the Ferraras difficulty obtaining cell phone
records, as of today, Plaintiffs have not subpoenaed the Ferraras’ cell phone records.

1 together and asserting that communications between the “Bay Boys” result in a
2 conspiracy thus resulting in liability of the Ferraras, without ever actually
3 demonstrating that the Ferraras are members of the so-called “Bay Boys.” (*See*
4 Docket Nos. 286-4 and 287, Frank Ferrara’s Statement of Uncontroverted Facts and
5 Conclusions of Law and Charlie Ferrara’s Statement of Uncontroverted Facts and
6 Conclusions of Law.)⁴

7 **3.2 Plaintiffs Do Not Contend That the Ferraras Continue to Withhold**
8 **Responsive Information**

9 Plaintiffs only argument that the Ferraras’ MSJs should be denied, or
10 continued, under Rule 56(d) is that the Ferraras allegedly withheld responsive
11 information until after filing their motions for summary judgment. However, the
12 import of such assertion is Plaintiffs’ admission that the Ferraras have in fact
13 produced the responsive information, and did so in advance of Plaintiffs’ deadline to
14 oppose the Ferraras’ MSJs.

15 Plaintiffs contend that Charlie Ferrara testified that he “ha[s]n’t really tried
16 that hard” to locate prior cell phone bills. However, Charlie Ferrara’s⁵ deposition
17 testimony reveals the good faith efforts he made, and that his mother also made, to
18 obtain his cell phone records. (Bacon Decl., Ex. G, C. Ferrara Dep. at 164:13-
19 166:4.) Also, once it became apparent that Charlie Ferrara required assistance to
20 gather information requested, Bremer Whyte Brown & O’Meara immediately
21 included itself in gathering the requested information, which Plaintiffs agree has
22 been produced. Further, Plaintiffs criticize the redactions made to the Ferraras’

23
24 ⁴ Furthermore, to the extent Plaintiffs allege spoliation of evidence, Plaintiffs fail to
25 demonstrate that the Ferraras’ actions resulted in any spoliation. At the very least,
26 Plaintiffs cannot demonstrate intentional spoliation of evidence on behalf of the
27 Ferraras.

28 ⁵ It is of note that Charlie Ferrara suffered from a serious brain injury in 2012
requiring six months of cognitive physical therapy. (Bacon Decl., Ex. G, C. Ferrara
Dep. at 26:3-17.) He, as a layperson, has also admittedly stated he is not good with
computers. (C. Ferrara Dep. at 46:15-47:3.)

1 production; however, as was addressed during the July 26, 2017 hearing, the
2 redactions were made in order to produce only responsive information to Plaintiffs’
3 requests rather than a bad faith “document dump” of thousands of irrelevant
4 messages. And given the lack of volume of responsive information remaining after
5 the redactions, Plaintiffs had enough time to review the documents and respond to
6 the Ferraras’ MSJs.

7 Plaintiffs cite to Burlington N. Santa Fe R.R. v. Assiniboine & Sioux Tribes of
8 the Fort Peck Reservation, 323 F.3d 767 (9th Cir. 2003) as support for their request
9 for the summary denial of the Ferraras’ MSJs pursuant to Rule 56(d). However, the
10 facts of Burlington are entirely distinguishable from this matter. In Burlington, the
11 appellate court determined it was “an abuse of discretion for the district court to
12 decide the summary judgment motion before granting the Tribes’ Rule 56(f) motion”
13 because the Tribes “had no fair opportunity to develop the record concerning the
14 extent of that threatened harm.” (Burlington at 774.) The plaintiff “brought a
15 summary judgment motion less than a month after filing suit” in Burlington. Such is
16 not the case here where Plaintiffs have had nearly a year to conduct discovery, have
17 done so through written requests and depositions and admit the Ferraras made a
18 complete production of documents before Plaintiffs were required to oppose the
19 Ferraras MSJs.

20 Garret v. San Francisco, 818 F.2d 1515 (9th Cir. 1987) is also distinguishable
21 from this matter before the Court. In Garret, the appellate court held “it was error for
22 the trial court to have granted defendants’ motion for summary judgment without
23 first having determined the merits of plaintiff’s pending [motion to compel
24 production of personnel records].” (Garret at 1518-19.) In this case, Plaintiffs have
25 no pending motion to compel against the Ferraras, and again admit all documents
26 have been produced prior to their opposition deadline.

27 As is referenced in Plaintiffs’ Motion, relief under Rule 56(d) is permitted
28 **only** when the party responding to a motion for summary judgment demonstrates “it

1 cannot present facts essential to support its opposition” and “where there is some
2 basis for believing the information sought actually exists.” (Fed. R. Civ. P. 56(d).)
3 Because Plaintiffs have all documents in the Ferraras’ possession responsive to the
4 requests, Plaintiffs cannot demonstrate that they lack facts essential to justify their
5 opposition. Furthermore, Plaintiffs have submitted no evidence to support a “basis
6 for believing the information sought [relating to a conspiracy between the Ferraras
7 and the other defendants that would support Plaintiffs’ claims] actually exists.”
8 (Burlington, infra, at 774-75.) Plaintiffs present no evidence demonstrating a
9 conspiracy relationship between the Ferraras and the other defendants. (*See* Docket
10 Nos. 286-4 and 287, Frank Ferrara’s Statement of Uncontroverted Facts and
11 Conclusions of Law and Charlie Ferrara’s Statement of Uncontroverted Facts and
12 Conclusions of Law.) Relief under Rule 56(d) is not to be granted as a matter of
13 course, but only upon a showing of good cause. (Hicks v. Johnson, 755 F.3d 738,
14 743 (1st Cir. 2014).) “Even upon the submission of the required materials, the
15 district court is entitled to refuse a Rule 56(d) motion if it concludes that the party
16 opposing summary judgment is unlikely to garner useful evidence from supplemental
17 discovery.” (Id.) Because Plaintiffs have demonstrated no good cause for the relief
18 sought in their Motion and have proffered no evidence demonstrating the potential
19 that a conspiracy relationship exists between the Ferraras and the other defendants,
20 Plaintiffs’ Motion should be denied. (Because Plaintiffs reference their opposition to
21 Individuals Defendants’ Motions for Summary Judgment and Plaintiffs’ Statement of
22 Additional Material Facts, the Ferraras herein incorporate by reference their replies
23 to Plaintiffs’ Opposition and responses to Plaintiffs’ Statement of Additional
24 Material Facts.)

1 **3.3 The Ferraras' Motions for Summary Judgment Should Not Be**
2 **Denied**

3 If the Court is inclined to grant any portion of Plaintiffs' request for relief, a
4 continuance of the hearing on the Ferraras' MSJs, rather than outright denial, is the
5 only result even potentially justifiable under the applicable law.

6 **4. CONCLUSION**

7 For the reasons set forth herein, Plaintiffs' Motion for Administrative Relief
8 pursuant to FRCP 56(d) must be denied. Plaintiffs have not demonstrated through
9 their Motion that they cannot present facts essential to justify the Ferraras's MSJs or
10 that there is some basis for believing that communications amounting to conspiracy
11 between the Ferraras and the other defendants actually exist. Should the Court be
12 inclined not to outright deny Plaintiffs' Motion, the Ferraras alternatively request the
13 hearing on the Ferraras' MSJs be continued to allow Plaintiffs to conduct their
14 desired further discovery before ruling on the Ferraras' MSJs.

15 Dated: August 15, 2017

BREMER WHYTE BROWN & O'MEARA
LLP

16
17 By: 

18 Alison K. Hurley
19 Tiffany L. Bacon
20 Attorneys for Defendants
21 FRANK FERRARA and CHARLIE
22 FERRARA
23
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PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 20320 S.W. Birch Street, Second Floor, Newport Beach, California 92660.

On August 15, 2017, I served the within document(s) described as:

FRANK FERRARA'S AND CHARLIE FERRARA'S OPPOSITION TO PLAINTIFFS' MOTION FOR ADMINISTRATIVE RELIEF PURSUANT TO FRCP 56(d)

on the interested parties in this action as stated on the attached mailing list.

☒ (BY ELECTRONIC MAIL SERVICE) Based upon CRC Rule 2.251 or an agreement of the parties to accept electronic service I caused such document(s) to be Electronically Mailed through Bremer, Whyte, Brown & O'Meara electronic mail system for the above entitled case. Should your office require a hard copy of said document, please contact our office.

Executed on August 15, 2017, at Newport Beach, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Hailey Williams
(Type or print name)


(Signature)

Cory Spencer v. Lunada Bay Boys et al.,

Case No. 2:16-cv-2129-SJO

BWB&O CLIENT: Frank and Charlie Ferrara
BWB&O FILE NO.: 1178.176

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